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# LUKAS, NACE, GUTIERREZ & SACHS

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February 1, 2006

RECEIVED

FEB - 1 2006

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Federal Communications Commission Office of Secretary

Re:

CC Docket 94-102

E911 Quarterly Report

Rural Cellular Corporation for itself and its affiliates

Dear Ms. Dortch:

On behalf of Rural Cellular Corporation and its subsidiaries<sup>1</sup> (collectively, "RCC") there is submitted herewith a report of the status of the company's implementation of E911 services.

RCC is a digital wireless carrier operating cellular radiotelephone and/or personal communications services in multiple markets. RCC is a Tier II carrier as defined in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 2002 FCC LEXIS 3638, FCC 02-210 (2002) ("Phase II Stay Order"). This report is submitted in compliance with the terms of the Phase II Stay Order.

Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein, in the narrative report and attached spreadsheet, be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

No. of Copies rec'd 0

This report pertains to the following companies which are wholly-owned subsidiaries of Rural Cellular Corporation and are authorized by the FCC to provide broadband Commercial Mobile Radio Service: RCC Atlantic Licenses, LLC; RCC Minnesota, Inc.; Wireless Alliance, LLC and TLA Spectrum, L.L.C.

February 1, 2006 Federal Communications Commission Page two

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

Pamel List

Pamela L. Gist

## Rural Cellular Corporation E911 Implementation Report February 1, 2006

## Summary

Rural Cellular Corporation ("Rural Cellular") operates wireless networks in rural communities in 14 states covering approximately 5.9 million people. RCC's service area encompasses 34 rural service areas, 3 metropolitan statistical areas and a few partitioned major and basic trading areas. Rural Cellular has deployed GSM and CDMA overlays in several markets, and continues to operate predominately its underlying TDMA/analog technology.

### Phase I

Rural Cellular has made progress in the deployment of Phase I location capability services. For details on these deployments, please refer to the spreadsheet set forth in the Appendix to this report.

### Phase II

Rural Cellular has also made progress in delivering Phase II services to public safety answering points. Rural Cellular continues to have concerns about the performance of network-based solutions in rural markets. Rural Cellular has elected a handset-based solution for all of its CDMA markets.

In addition to the network-based solution provided by Grayson Wireless, Rural Cellular has been deploying in certain TDMA and GSM networks an alternative network-based solution provided by Polaris Wireless.

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	PSAP RFS sent 104/01. RCC sent to Intrado 8/14/02. 6/10/04. Intrado sent Test Validation Worksheet - ready to test. 8/24/04. Email from PSAP asking about their deployment. Intrado sent email to RCC checking into it. 8/25/04. Intrado also sent				
	177200C.	1112005	100A 1025/2003	XS Soot 2	2020 Scon county citering Office
	Intrado was advised by SBC that tunks are ready. 11/204. Email from SBC advising trunk orders for Sherman County and Scott County may have been switched - Scott trunks were povesioned for Sherman. 12/20/2004 Pending trunks, scheduled P1 testing for 1/5/2005. Tested P1, SBC had not turned up steering for trunks, will retest the story.			:	
	on to SBC. 8/11/04: httpado made a follow-up attempt for status on the exhibits. 8/12/04: Received exhibit approval from SBC. Forwarded this on to RCC. 10/18/04:				
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	on to SBC. 8/11/94: Intrado made a follow-up attempt for status on the exhibits.  8/12/04: Received exhibit anomyal from SBC. Forwarded this on to RCC. 10/18/04:				
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	deployment). Cell data sent to Intrado 3/1/04. Intrado sent Test Validation				
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PSAP agrees to allow Unice! to remain at Phase I until more sites are added to allow Phase II.	Pending Trunks. 10/31/05network configuration cannot support triangulation; 11/14/05 F	273/06		Thomas	
	withdrawing their request for service. Letter received for withdrawal.	2	TDMA 9/24/2004 2/28/2005 Y	KS Thomas 2	2846 Thomas County Sheriffs Office
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7		OR Baker		TD444 2711/2000		\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	4/10/2003	LIST SEADS ASSISTED IN THE NAV. IN SAL TEALURE SEALS; WITH TREW SWALLT.  LIST SHARE IN SECRETARY OF THE SEALS SWALLT SWALLT.
5 E	Corvality Regional Communications Center-Serion County	Τ		T		<u> </u>	4/10/2003	Deaded by undated address, Information needed by PSAP.
7			Ē			, ,	1/23/2003	
Т	ment	П	1 TOMA	П		λ ,	8/30/2004	
_		OR Harney	Ē	ñ	<b>&gt;</b>	z	2	PSAP equipment not upgraded for Phase 1. This is a secondary PSAF.
Н		OR Harney	1 D	Ĵ		<del>ر</del> ۲	6/29/2005	SAROS PSAP LIVE
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7	Jefferson County Sheriffs Office	T		Ţ		<u>}</u>	6/16/2005	AND AND COUNTY
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1		Γ		TDMA 10/14/1998		\ <u>\</u>	8/14/2002	
7-		Г	Ē	Γ		×	5/23/2002	MSC feature issues with new switch.
5797 Mail	fice		1 TDMA			γ	8/11/2005	LIVE 8/11/05 - Slight delay due to LEC issues
П	unity Sheriffs Office		GSM	3M 2772005		<u>*</u>	8/11/2005	LIVE 8/11/05 - Sign't delay due to LEC issues
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5507 UNK	Undon County Scientis Office	7	GSM	1010004		<u> </u>	1/16/2004	
		SD Codinaton	2 TOMA	Т		z	11/5/05	PSAP equipment not able to rebid. Deployment on hold
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7		T	P .	Т	+	,	8/6/2002	NO GRES SYSTEMS FOR A STATE OF A
7237 Shel		VT Chillenden	Z Z	CS14 1772002		<b>,</b>	559/2003 12/16/2003	Net o mortin Co. Osevoradne Net data avalable
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1			2 10			>	5/9/2003	Met 6 month FCC deliverable
		П	H GSM	П		>	12/16/2003	No data available
7242 Ven			2 GSM	T		> :	4/9/2004	Met 6 month FCZ deliverable
T		VT Franklin	TOWA	Τ		> >	0.62003	NO Great a Verlander Na Propriet FCT Abilitate Teles
7	St Audels Force	V Landile		TDMA 3282000		>	8/6/2002	No data available
		ľ	2 TD	Ė		47 ≻	5/9/2003	Met 6 month FCC deliverable
			1 GSM	Ħ		٨	12/16/2003	No data available
	Lamoille County Sheriff		2 GSM	┪		<u>}</u>	4/9/2004	Met 6 month FCC deliverable
7241 Ven		1		1	+	<u></u>	8/6/2002	No data avalable
		Ţ	2 TDMA			<u> </u>	5/9/2003	Mare ormalisme Mare ormalisme
- 1		Action Properties	3 7	TDM6 agence		<u> </u>	4.95.0003	MeConstruction
7235 Mon	Monthelier Civ Police		2 2	Г		<u></u>	5/9/2003	Met 6 month FCC definerable
Ť	Rockinoham		Ę	Ť.		<u>}</u>	B/6/2002	No data avakable
Т			2 TD	П		<i></i>	\$79/2003	Met 6 north FCC deliverable
	Vermont State Police-Rockingham		2 GSM	П		>	4/9/2004	Met 6 month FCC deliverable
$\neg$		VT Windsor	2 1	TOMA 3/28/2000		<u>-</u> - '	8/6/2002	Leader Available
_		Т	2 2	T		- >	2002/603	IMED INDITITION OF THE PROPERTY OF THE PROPERT
7738 Spen	Springheid Police Department	V Windsor	2 TOMA	MA ITTOOL	  -  -	<u> </u>	5/9/2003	Net 6 month FCC deliverable
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	_	Chelan	1 TOMA			IY.	9/22/20				No Oata available for delays	
7252 Rivercom	WA	Chelan	Z TOMA	2/27/2004		Υ.	12/15/2	717	19/04		Connection to Polaris PDE	
7252 Rivercom	WA	Chelan	2 GSM	2/27/2004		Y	1/24/20					
7258 Columbia County Sheriffs Office	WA	Columbia	TDMA	11/4/2002		Y_	6/30/20	003			No Data available for delays	
7258 Columbia County Sheriffs Office	WA	Columbia	TDMA	11/4/2002		Y	11/10/2	2004			Connection to Polaris PDE	
7258 Columbia County Sheriffs Office	WA	Columbia	GSM	11/4/2002	I	ΥΥ	1/24/20	005				
7260 Cowlitz County 9-1-1 Center	WA	Cowlitz	TDMA	3/9/2005	4/6/2005 Y	N	Į	<u> </u>			No coverage in this area	
7266 Ferry County E9-1-1	WA	Ferry	AMGT J	12/2/2002	T[	ΥΥ	9/10/20	003			No Data available for delays	
	WA	Ferry	Z TDMA	3/16/2004	T	Y	11/16/2	2004			Connection to Polaris PDE	
7266 Ferry County E9-1-1	WA	Ferry	GSM	3/18/2004	T	Y	1/24/20	005				-
7278 Garfield County Sheriffs Office	WA	Garfield	TDMA	10/25/2002	T [	Υ_	6/30/20	003			No Data available for delays	
	WA	Garfield	Z TDMA	3/11/2004	T I		11/10/2	2004			Connection to Polaris PDE	
7278 Garfield County Sheriffs Office	WA	Garfield	GSM	3/11/2004		Y	1/24/20	005				
7324 Okanogan County Sheriffs Office	WA	Okanogan	TDMA	10/31/2002		Y	6/30/20	003			No Data available for delays	
7324 Okanogan County Sheriffs Office	WA	Okanogan	TDMA	5/6/2004		Υ	12/6/20	004 12/8	9/04		Connection to Polaris PDE -Pending PSAP upgrades (ETA 12/6/04)	
7324 Okanogan County Sheriffs Office	WA	Okanogan	GSM	5/6/2004		Y	1/24/20	005				
7329 Pend Oreille 9-1-1	WA	Pend Oreilla	AMGT] 1	11/8/2002	T	Y	6/30/20	003			No Data available for delays	
7329 Pend Creite 9-1-1	WA	Pend Creille	Z TOMA	6/1/2004	$\top$	ΥΥ	12/9/20	004 12/8	9/04		Connection to Potaris PDE -Pending PSAP upgrades (ETA 12/6/04)	
7329 Pend Creille 9-1-1	WA	Pand Crails	GSM	6/1/2004		Y	1/24/20	005				
7359 Stevens County Department of Emergency Services	WA	Stevens	TDMA	12/10/2002	$\top$	Ϋ́	9/9/200	03			No Data available for delays	
	WA	Slevens	TDMA	5/14/2004	T	Y	11/16/2	2904			Connection to Polaris PDE	
	WA	Slevens	GSM	5/14/2004	T	Υ	1/24/20	005				
	WA	Walla Walla	TOMA	9/11/2002		Y	6/30/20	590		- 1	No Data available for delays	
7373 Walla Walta Emergency Services Communications Center	WA	Walla Walla	Z TDMA	3/17/2004		Y_	11/5/20	004			Connection to Polaris PDE	
7373 Walla Walla Emergency Services Communications Center	WA	Walla Walla	GSM	3/17/2004		Y	1/24/20	005				
7384 Whitcom (Whitman County) Moscow Idaho	WA	Whitman	1 TDMA	4/24/2002		Y	6/30/20	003			No Data available for delays	
7384 Whitcom (Whitman County) Moscow Idaho	WA	Whitman	TDMA	4/30/2004		Y	11/17/				Connection to Polaris PDE	
	WA	Whitman	2 GSM	4/30/2004		Y	1/24/20	005				